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May 14, 2025

VIA ECF

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Charles Saldarriaga v. City of New York, et al.,
25-CV-1115 (RPK)(JRC)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney assigned to the defense in the above-referenced matter.¹ I write on behalf of the City of New York seeking clarification of Your Honor's May 13, 2025 Order.

By way of background, on May 12, 2025, Defendants City of New York ("City"), Sergeant Det. William Planeta, and Defendant Det. Eric Bolger requested an extension of time to answer, move, or otherwise respond to Plaintiff's Complaint until 30 days after proof of service on Defendants Det. Leonardo Moscoso and Officer Mohammad Hossain had been entered on the Court's docket. (See ECF No. 12). On May 13, 2025, Your Honor partially granted Defendants' request, and Ordered that "Defendants Sergeant Detective William J. Planeta and Detective Eric Bolger shall answer move or otherwise respond to the complaint by 7/14/2025." However, Your Honor's Order did not reference the City's request for an extension.

¹ This case is assigned to Assistant Corporation Counsel ("ACC") Michael Futral, who is presently awaiting admission to the Eastern District of New York and is handling this matter under my supervision. Mr. Futral may be reached directly at (212) 356 – 1643 or by email at mifutral@law.nyc.gov.

To avoid any misunderstanding or inadvertent noncompliance, I respectfully seek clarification as to whether the City is also subject to the July 14, 2025 deadline or remains May 15, 2025.

Thank you for your time and consideration herein.

Respectfully submitted,

Joseph Zangrilli /s/

Joseph Zangrilli

Senior Counsel

Special Federal Litigation Division

Cc: **VIA ECF & FIRST CLASS MAIL**

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